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Attorneys for Plaintiff  
UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER SMIRNOV,

Defendant.

No. CR 2:24-cr-00091-ODW

**GOVERNMENT'S PROPOSED  
VOIR DIRE QUESTIONS**

Trial Date: December 3, 2024  
Trial Time: 9:00 a.m.  
Location: Courtroom of the  
Hon. Otis Wright

The parties—the Plaintiff, United States of America, by and through its counsel of record, pursuant to the Court's April 12, 2024 Order Continuing Trial (ECF 65), which

incorporates by reference the parties' joint stipulation (ECF 64), submits Proposed Voir Dire Questions for the trial of defendant Alexander Smirnov.

Dated: November 18, 2024

Respectfully submitted,

DAVID C. WEISS  
Special Counsel

/s/

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**GOVERNMENT’S PROPOSED VOIR DIRE QUESTIONS**

1. [Court Describes Trial Schedule]. Does the schedule that I have just mentioned present a special problem to any of you?
2. [Court Reads Statement of the Case]. Have you heard or read anything about this case or the underlying investigation from the news, social media, or any other source?
3. Have you formed any opinions about this case that would prevent you from being a fair and impartial juror?
4. Is there anything about the nature of the charges in this case that would prevent you from being a fair and impartial juror?
5. The lawyers involved in this case are: Leo Wise and Derek Hines, of the United States Department of Justice, who represent the United States, and [Insert Defense Lawyers], who represent the defendant, Alexander Smirnov. Do you or your immediate family, such as spouse, child, parent, or sibling, know any of the attorneys I have just named?
6. Have you or any member of your immediate family had any business dealings with, or been employed by, any of these attorneys or their offices?
7. Are you, any member of your immediate family, or close friends acquaintances with Alexander Smirnov or any member of his family?
8. The potential witnesses in this case are: [Read from Witness Lists Provided to Court by the Parties]. Are you familiar with any of these potential witnesses?
9. The law enforcement agency involved in this case is the Federal Bureau of Investigation (FBI). Would the fact that this agency investigated this case interfere with your ability to be a fair and impartial juror?
10. Have you, any member of your immediate family, or close friends ever been employed by, or investigated by, any law enforcement agency, including:

1 state or local police, the IRS, the FBI, ATF, DEA, the Secret Service, U.S.  
2 Marshals, U.S. Immigration and Customs Enforcement, U.S. Customs and  
3 Border Protection, the Bureau of Prisons, any state or federal prosecutor's  
4 office, or any state or local prison system?

5 11. Do you believe that a private citizen should be able to lie to a law  
6 enforcement officer?

7 12. Do you believe that you will give more or less weight to the testimony of a  
8 law enforcement officer, simply because he or she is employed as a law  
9 enforcement officer?

10 13. Have you or any member of your immediate family ever been (a) a victim  
11 of a crime, (b) a witness in a criminal case, or (c) arrested for a crime, not  
12 including minor traffic offenses?

13 14. Do you have any opinions about the criminal justice system that would make  
14 it difficult for you to be a fair and impartial juror in this case?

15 15. Are you, any member of your immediate family or a close friend studying,  
16 planning to or currently working in a legal profession (e.g., lawyer,  
17 paralegal, legal secretary)?

18 16. If you were eligible to vote in any election(s) in which Joseph R. Biden was  
19 a candidate, would that fact prevent you from maintaining an open, impartial  
20 mind until all of the evidence is presented, and the instructions of the Court  
21 are given?

22 17. Have you ever donated money to a political campaign?

23 18. Have you ever been actively involved in a political campaign, political  
24 organization, or any organization that is associated with a political party?

25 19. Have you, or any member of your immediate family or household ever run  
26 for, sought, or held any elected or appointed political office?  
27  
28

20. Do your views regarding the 2020 election in any way prevent you from being a fair and impartial juror in this case?
21. Do you believe the United States Department of Justice, the FBI, ATF, DEA, or any other law enforcement agency investigates and prosecutes individuals because of politics?
22. If you are selected to sit as a juror in this case, would you be unable to render a verdict solely on the evidence presented at trial?
23. If you are selected to sit as a juror in this case, would you be unable to follow the law as I give it to you?
24. If you are chosen to sit as a juror in this case, you will be instructed that you will not be able to do any research or investigation, including on the Internet, on any issues in the case or communicate with others about your jury service. Is this an instruction that you will be unable to follow?
25. Under the law, a defendant need not testify or produce any evidence. The burden of proof is always on the government. If a defendant does not testify, the jury may not consider that fact in any way in reaching a decision. Would you have any difficulty following this rule?
26. A fundamental principle of our legal system is that when a person is charged with a crime, he is presumed to be innocent unless and until the Government proves guilt beyond a reasonable doubt. If you are selected as to sit as a juror in this case, will you have difficulty following this rule of law?
27. Alexander Smirnov, as the defendant in this case, may choose not to testify in his own defense, and I instruct you that the choice not to testify, if that is Alexander Smirnov's choice, may not be held against him. If you are selected as a juror in this case, will you have difficulty following this instruction?
28. Have you served on a jury in a criminal case before?

29. Have you served on a grand jury before?

30. Have you ever been a witness in a civil or criminal matter, or been a plaintiff or defendant in any case?

31. Is there anything, such as poor vision, difficulty hearing, difficulty understanding spoken or written English, that would make it difficult for you to serve on this jury?

32. This is the last question. Is there anything else, including something that you have remembered in connection with one of the earlier questions, that you think you would like to tell me in connection with your service as a juror in this case?